

8EHQ-1196-13818
Clariant

Blair W. Drum
Regulatory Affairs Manager
Environmental, Safety and
Product Safety Department
4000 Monroe Road
Charlotte, NC 28205
Direct Phone: 704.331.7711
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**8EHQ-96-13818**

November 26, 1996

Contains No CBI

Document Processing Center (G-099)
(Attn.: Section 8(e) Coordinator)
Office of Pollution Prevention and Toxics (Mail Code 7407)
U.S. Environmental Protection Agency
401 M Street, S. W.
Washington, DC 20460

**88970000068**

RE: TSCA (90 Stat. 2029, 15 U.S.C. 2607(e)) Section
8(e) Notification of Substantial Risk

Dear Sir:

The following information is being submitted in accordance with the Notification of Substantial Risk reporting requirements of Section 8(e) of the Toxic Substances Control Act.

This notification is being submitted for Clariant Corporation, 4000 Monroe Road, Charlotte, NC 28205, telephone (704) 331-7000.

The identity of the chemical substance for which this report is being submitted is follows:

Propanedioic acid, [(4-methoxyphenyl)methylene]-, bis(1,2,2,6,6-pentamethyl-4-piperidiny) ester

The CAS Number for this chemical substance is 147783-69-5. The commercial name of the chemical product in the United States is SANDUVOR PR-31 Powder, and in France it is known as VP SANDUVOR PR-31. This chemical substance was submitted for PMN review and assigned PMN No. P-95-1411. A Section 5(e) Consent Order has been entered into and is identified by DCN 50960000052 for this chemical substance.

The information being provided is a copy of a telefax received from the manufacturer

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TSCA Section 8(e)
Notification of Substantial Risk
CAS No. 147783-69-5

of the chemical substance, Clariant Huningue SA, of Huningue, France, which was originally received by them from a company evaluating the chemical product in a powder coating application. The telefax was submitted to Clariant Huningue by a Dr. Peter Dolfen of the Department of Occupational Health of Herberts GmbH of Wuppertal, Germany. A copy of this telefax is attached to this document.

The effect being reported by Dr. Dolfen was that of a skin sensitization to one of the painters in their experimental application department being used as a component of a powder coating preparation. Dr. Dolfen reports that "Complex testings showed that light stabilising substance to be the cause of allergic skin reaction in a way, that this man is no more able to work with preparation containing that material."

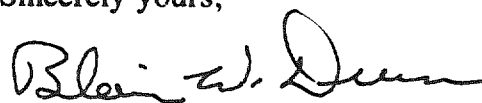
This is the full extent of information known to this reporting company at this time. We consider that we have insufficient information to fully evaluate this information, but it does have the potential of substantial risk and as such we are thus notifying the Agency. Other hindered amines are known to present a risk of skin sensitization. At this time, the quantity of the product being used commercially is low, the Section 5(e) Consent Agreement specifically requires the material be used in a manner which will prevent inhalation exposure until that time when further toxicological evaluation can be made by the agency following specified testing and workplace monitoring. The Agency has assigned a New Chemical Exposure Limit of 0.3 mg/m³ as an 8-hour time-weighted average in the Section 5(e) Consent Order. As such, we believe the risk to workers in this country is minimized.

Our MSDS has been modified to warn persons using the substance to avoid skin contact and a warning has been placed on the product label.

For further information concerning this report please contact:

Blair W. Drum
Regulatory Affairs Manager
Clariant Corporation
4000 Monroe Road
Charlotte, NC 28205
Telephone: (704) 331-7711

Sincerely yours,



Blair W. Drum
Regulatory Affairs Manager

T45 ZU2 0290329

+49 202-5296329 HERBERTS GMBH

811 P01 02.09.96 08:30

FAX Übertragung

Von / from: Dr. Peter Dolfen
Request? FAX:+49 202 529 -35 6704
TEL.:+49 202/529 - 6704
An / to: Dr. D. Karanatsios

Herberts GmbH
Dept.Occup. Health
Märkische Str. 243
D - 42281 Wuppertal

Abt. / dept: Clarlant
ENV./TOX/REG

FAX - Nr.: 0033.8989 6196

TEL.- Nr.:

Datum /date: 30.08.1996

Seitenanzahl: - 1 -

Uhrzeit: 15:55

4.9.96

Ref.: VP Sanduvor PR 31

Dear Mr. Karanatsios

from Dr. Kinza in my Company I got the SDS of the above mentioned material. I think it necessary to inform you, that one of our painters in the experimental application dept. happened to sensitize with this raw material as component of a powder coating preparation. Complex testings showed showed that light stabilizing substance to be the cause of allergic skin reaction in a way, that this man is no more able to work with preparations containing that material. This case will be recognized as a occupational disease by the German authorities. So i would like to ask you, if there are really no signs for sensitization in your testings as it is written in the safety data sheet. Is there data concerning mutagenicity, cancerogogenicity or reproductive toxicity ?

Thank you for information

kind regards

Best Available Copy

cc: Herren L. AVAR
F. BRENZIKOFER
A. BOSCH